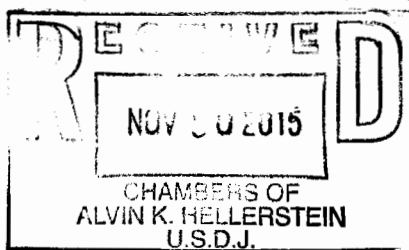


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November 29, 2015

Via ECF and Facsimile

Honorable Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

*So received
11-30-15
Alvin K. Hellerstein*

Re: Vera, et al. v. Banco Bilbao Vizcaya Argentina (S.A.), et al.
No. 12 Civ. 1596 (S.D.N.Y.) (AKH)

Dear Judge Hellerstein:

This firm is counsel to The Bank of New York Mellon ("BNY Mellon"), one of the garnishee banks named as a respondent in the above action. On behalf of BNY Mellon, and in accordance with Rule 1.D of Your Honor's Individual Rules, I write to request a short extension, from December 1 to December 4, 2015, of the bank's time to respond to petitioners' pending motion for summary judgment directing the turnover of four separate blocked accounts held by the bank. As represented by Robert A. Swift, counsel for petitioner Aldo Vera, Jr., all petitioners consent to this request. BNY Mellon has not previously sought an extension of time to respond to petitioners' motion.

BNY Mellon requests an extension to give the parties additional time to try to reach an amicable resolution of petitioners' motion that would obviate the need for further briefing. Mr. Swift and I began discussions regarding such a resolution before the Thanksgiving holiday, and after he and I had made considerable progress, he undertook to speak with counsel for the Hausler and Villoldo petitioners. By the time of the holiday, however, the discussions among the parties were still ongoing, and Mr. Swift and I agreed that it made sense to seek a short adjournment of BNY Mellon's time to respond to petitioners' motion to give the parties sufficient time to conclude their discussions before the bank's response is due.

In the event no resolution is reached, and BNY Mellon proceeds to file its response by December 4, then petitioners' reply brief would remain due, as of the time of this request, by December 15, 2015. The only other date currently scheduled in the case – a status conference set for February 25, 2016 – is unaffected by the bank's extension request.

Honorable Alvin K. Hellerstein
November 29, 2015
Page 2 of 2

We thank Your Honor for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Steven B. Feigenbaum", written over the printed name.

Steven B. Feigenbaum

cc: All Counsel of Record
(via ECF)